

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

In re:)	
)	
Christopher J. Cavalier)	CASE NO. 18-03303
And,)	
Maragaret A. Cavalier)	JUDGE Henry W. Van Eck
)	
Debtor)	

**NewRez LLC d/b/a Shellpoint Mortgage Servicing NOTICE OF DEBTOR'S
REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Creditor”), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor’s request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 10/01/20 through 12/01/20. Creditor holds a secured interest in real property commonly known as 4581 MANOR DR, MECHANICSBURG, Pennsylvania 17055 as evidenced by claim number 13-3 on the Court’s claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 01/01/21 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance

arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC
Authorized Agent for Secured Creditor
10700 Abbott’s Bridge Road, Suite 170
Duluth, GA 30097
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esq.
E-mail: cwohlab@rascrane.com

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 11th day of December 2020:

Christopher J. Cavalier
4581 Manor DR
Mechanicsburg, PA 17055

Maragaret A. Cavalier
4581 Manor DR
Mechanicsburg, PA 17055

And via electronic mail to:

Chad J. Julius
Jacobson & Julius
8150 Derry Street, Suite A
Harrisburg, PA 17111

Charles J DeHart, III (Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

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By: /s/ Maria Jaramillo
Maria Jaramillo
Email: mjaramillo@rascrane.com